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DUE
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ELINGAME, A H

PP RD

QUICHER D W

VIS J G

FRED J E

FRERA D W

BRIS L P

AIKOR F J

NOIS G E

COWIN P

LY J

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S J P

ELE P B

OSH J M

BY W A

VEBC J A

E E M

JESTIC J P

THEWS T A

JRRENE B E

EGAN P V

ETH P

MEF L A

ZUTO V M

TER G L

DADES J L

PELL B F

ANSON E R

EBE J S

KINSON R B

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Department of Energy

ROCKY FLATS OFFICE
P O BOX 928
GOLDEN COLORADO 80402 0928

MAY 14 4 49 PM '91

ROCKY FLATS
CORRESPONDENCE CONTROL

MAY 09 1991

91-3468-DOE

Mr Robert Shankland
U S Environmental Protection Agency
Region VIII, 8 WMC
999 18th Street, Suite 500
Denver, Colorado 80202-2413

Permit No CO0001333

Dear Mr Shankland

The purpose of this letter is to provide written notification to you of an exceedence of a daily maximum effluent limitation, per Part IIA 2 of the Rocky Flats National Pollutant Discharge Elimination System (NPDES) permit, Number CO0001333. The exceedence in question was for total residual chlorine (TRC) at Terminal Pond B-5, in a measurement taken on April 25, 1991. The TRC limitation for Pond B-5 (established as a condition of the recently signed NPDES Federal Facility Compliance Agreement [FFCA]) is 0.5 milligrams per liter (mg/l). The value noted in Pond B-5 on April 25 was 0.71 mg/l. Pond B-5 was not being discharged directly at the time, but was being transferred to Terminal Pond A-4 for treatment and subsequent discharge to North Walnut Creek. Per your guidance to us, samples are being taken in Pond B-5 prior to the transfer to Pond A-4 according to the schedule set up in the FFCA even though direct discharge is not taking place from Pond B-5. This exceedence was reported to you verbally by John Rampe of my staff on May 1, 1991, immediately upon our learning of its occurrence.

We believe that the value in question is in error, either as the result of a faulty instrument reading or as the result of an error in recording the reading by the field sampler. We have reviewed the TRC data taken from sites immediately upstream of Pond B-5 (i.e., Pond B-3 and the sewage treatment plant outfall) and for Pond B-5 itself from April 23 through April 27. TRC values ranged in these instances from zero to 0.13 mg/l, all of which were well below the effluent limitation. There appears to have been no source of TRC in waters upstream, and no corresponding value in Pond B-5, leading us to the conclusion that the value of 0.71 mg/l TRC in Pond B-5 on April 25 was an error. As such, we are taking no direct corrective actions, although we are in the process of formally ensuring that our field samplers are aware of NPDES permit limitations at all sampling sites, that anomalous values such as the one reported herein are confirmed (particularly in situations where no sample is collected and re-runs are impossible) and that verified exceedences are reported to us in a more timely manner. Please let us know if you believe other corrective actions may be warranted in this instance.

ADMIN RECORD

A-0006-000173

Mr Robert Shankland

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MAY 09 1991

If you have any questions or would like more information concerning this incident, please call me or Tom Lukow of my staff at 966-4561

Sincerely,



David P Simonson
Assistant Manager
for Environmental Management

cc

T Lukow, DOE/RFO

J Rampe, DOE/RFO

J Kersh, EG&G/RF